

HON. BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

INTEGON PREFERRED INSURANCE  
COMPANY, a foreign corporation,

Plaintiff,

v.

DANIEL WILCOX and ELIZABETH  
WILCOX, Washington residents; and ERIC  
HOFF; a Washington resident,

Defendants.

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DANIEL WILCOX and ELIZABETH  
WILCOX, Washington residents,

Counterclaimants,

v.

INTEGON PREFERRED INSURANCE  
COMPANY, a foreign corporation,

Counter-defendant.

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NO. 2:21-cv-01501-BJR

**DECLARATION OF RUBY K.  
ALIMENT IN SUPPORT OF  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT BY THIRD-  
PARTY PLAINTIFFS DANIEL  
WILCOX AND ELIZABETH  
WILCOX**

DECLARATION OF RUBY K. ALIMENT IN SUPPORT OF MOTION FOR PARTIAL SUMMARY  
JUDGMENT BY THIRD- PARTY PLAINTIFFS DANIEL WILCOX AND ELIZABETH WILCOX - 1

DANIEL WILCOX and ELIZABETH  
WILCOX, Washington residents,

Third-Party Plaintiffs,

v.

ROBERT W. WARREN, ATTORNEY AT  
LAW, PLLC, a Washington professional  
limited liability company dba WRIXTON  
LAW OFFICE; and SMITH FREED  
EBERHARD, P.C., a foreign professional  
services corporation,

Third-Party Defendants.

I, Ruby K. Aliment, declare under penalty of perjury under the laws of the State of  
Washington that the following is true and correct:

1. I am above the age of 18, am competent to be a witness, and make this declaration  
based upon my personal knowledge. I am an attorney for third-party plaintiffs Daniel Wilcox and  
Elizabeth Wilcox.

2. Attached as **Exhibit 1** is a true and correct copy of excerpts of the deposition of  
Daniel Lee Wilcox.

3. Attached as **Exhibit 2** is a true and correct copy of the Order Granting Plaintiff's  
Motion to Strike and Denying Defendants Wilcox's Motion to Vacate Entry of Judgment in  
Snohomish County Cause No. 20-2-00372-31.

4. Attached as **Exhibit 3** is a true and correct copy of excerpts of the deposition of  
Robert Wrixton Warren.

5. Attached as **Exhibit 4** is a true and correct copy of excerpts of the deposition of  
Elizabeth ("Lisa") Wilcox.

DECLARATION OF RUBY K. ALIMENT IN SUPPORT OF MOTION FOR PARTIAL SUMMARY  
JUDGMENT BY THIRD- PARTY PLAINTIFFS DANIEL WILCOX AND ELIZABETH WILCOX - 2

6. Attached as **Exhibit 5** is a true and correct copy of the letter from Robert Warren to National General/Integon Claims Adjuster dated February 5, 2020.

7. Attached as **Exhibit 6** is a true and correct copy of the representation letter from Cliff Wilson to National General/Integon dated February 23, 2021.

8. Attached as **Exhibit 7** is a true and correct copy of the representation letter from Cliff Wilson to Daniel Wilcox dated February 24, 2021.

9. Attached as **Exhibit 8** is a true and correct copy of excerpts of the deposition of Clifford Wilson.

10. Attached as **Exhibit 9** is a true and correct copy of excerpts of the deposition of Joyce L. Fung.


11. Attached as **Exhibit 10** are true and correct copies of April 2021 emails between SFE and the Wilcoxes.

12. Attached as **Exhibit 11** is a true and correct copy of the email from Lisa Wilcox to Joyce Fung on May 3, 2021.

13. Attached as **Exhibit 12** is a true and correct copy of the transcription of the October 6, 2021 Motion Hearing to Vacate Default Judgment.

Dated this 12<sup>th</sup> day of January, 2023, in Seattle, WA.

STRITMATTER KESSLER KOEHLER MOORE

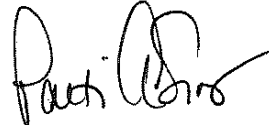
  
RUBY K. ALIMENT, WSBA #51242  
Counsel for Defendants/Counterclaimants/Third-Party Plaintiffs Wilcox

DECLARATION OF RUBY K. ALIMENT IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT BY THIRD- PARTY PLAINTIFFS DANIEL WILCOX AND ELIZABETH WILCOX - 3

CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2023, I electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

DATED at Seattle, Washington, this 12<sup>th</sup> day of July, 2023.



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Patti Sims, Paralegal  
[pattis@stritmatter.com](mailto:pattis@stritmatter.com)

DECLARATION OF RUBY K. ALIMENT IN SUPPORT OF MOTION FOR PARTIAL SUMMARY  
JUDGMENT BY THIRD- PARTY PLAINTIFFS DANIEL WILCOX AND ELIZABETH WILCOX - 4